

EXHIBIT 16

MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCUMENT SOUGHT TO BE SEALED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

ANIBAL RODRIGUEZ, et al.,)
individually and on behalf of)
all others similarly situated,)
)
Plaintiffs,)
)
-vs-) CASE NO.
) 3:20-cv-04688
GOOGLE, LLC,)
)
Defendant.)
-----)

VIDEOTAPED DEPOSITION OF EDWARD WENG

FRIDAY, SEPTEMBER 23, 2022

9:09 a.m.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

REPORTED BY:
ERIKA SJOQUIST, CSR, RPR, CRR
CA CSR No. 12350
File No. 5490695

1 Q. Okay. 10:47:02

2 A. No, I've never seen this document before. 10:47:15

3 Q. Okay. Do you know what the term "WebView" 10:47:17

4 means in the context of mobile apps? 10:47:25

5 A. I don't. 10:47:27

6 Q. And here, it says "GMA SDK" and then there's a 10:47:28

7 diagram that has, you know, an arrow, Ad Request, and 10:47:39

8 goes to AdMob or Ad Manager. 10:47:45

9 Does that refresh your recollection about what 10:47:47

10 the GMA SDK is? 10:47:49

11 A. Yeah. I think that's an interchangeable term 10:47:51

12 with the AdMob SDK. 10:47:54

13 Q. Okay. It also says "Ad Manager" here. How, if 10:47:57

14 at all, does the GMA SDK relate to Ad Manager? 10:48:00

15 A. I can't quite recall. Sorry. 10:48:05

16 Q. Okay. When you worked on AdMob, could 10:48:09

17 developers use AdMob only if they used the AdMob SDK? 10:48:20

18 A. My understanding is that that is correct. 10:48:25

19 Q. Okay. And when you started working on AdMob, 10:48:28

20 what data about user activity on non-Google apps did the 10:48:35

21 AdMob SDK collect, if any? 10:48:41

22 A. So I am not privy to those details. I didn't 10:48:44

23 work on the SDK. That wasn't my product. 10:48:48

24 Q. Can you remind me what your product was? 10:48:51

25 A. Yeah. My product was specifically around the 10:48:55

C E R T I F I C A T I O N

I, THE UNDERSIGNED, A CERTIFIED SHORTHAND
REPORTER OF THE STATE OF CALIFORNIA, DO HEREBY CERTIFY:

THAT THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE
ME AT THE TIME AND PLACE HEREIN SET FORTH; THAT ANY
WITNESSES IN THE FOREGOING PROCEEDINGS, PRIOR TO
TESTIFYING, WERE DULY SWORN; THAT A RECORD OF THE
PROCEEDINGS WAS MADE BY ME USING MACHINE SHORTHAND,
WHICH WAS THEREAFTER TRANSCRIBED UNDER MY DIRECTION;
THAT THE FOREGOING TRANSCRIPT IS A TRUE RECORD OF THE
TESTIMONY GIVEN.

FURTHER, THAT IF THE FOREGOING PERTAINS TO THE
ORIGINAL TRANSCRIPT OF A DEPOSITION IN A FEDERAL CASE,
BEFORE COMPLETION OF THE PROCEEDINGS, REVIEW OF THE
TRANSCRIPT [X] WAS [] WAS NOT REQUIRED.

I FURTHER CERTIFY I AM NEITHER FINANCIALLY INTERESTED
IN THE ACTION NOR A RELATIVE OR EMPLOYEE OF ANY ATTORNEY
OR PARTY TO THIS ACTION.

IN WITNESS WHEREOF, I HAVE THIS DATE SUBSCRIBED MY
NAME.

DATED: October 2, 2022



ERIKA A. SJOQUIST, CSR, RPR, CRR
CA CSR NO. 12350